

# **EXHIBIT 2**

## **Notice**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**NOTICE OF MOTION AND OPPORTUNITY TO RESPONSE**

**PLEASE TAKE NOTICE** that on November 22, 2013, the Debtor, City of Detroit, filed its *Motion For Entry Of An Order Establishing Pre-Trial And Trial Procedures And Setting Additional Hearings* (the “**Motion**”) in the United States Bankruptcy Court for the Eastern District of Michigan (the “**Bankruptcy Court**”) seeking entry of an order setting certain pre-trial and trial procedures relative to the hearing on the Motion of Debtor for Entry of an Order (I) Authorizing the Assumption of that Certain Forbearance and Optional Termination Agreement Pursuant to Section 365(a) of the Bankruptcy Code, (II) Approving Such Agreement Pursuant to Rule 9019, and (III) Granting Related Relief and the hearing on the Motion of the Debtor For a Final Order Pursuant to 11 U.S.C. §§ 105, 362, 364(C)(1), 364(C)(2), 364(E), 364(F), 503, 507(A)(2), 904, 921 and 922 (I) Approving Post-Petition Financing, (II) Granting Liens and Providing Superpriority Claim Status and (III) Modifying Automatic Stay, set to take place in the Bankruptcy Court on December 10, 2013.

**PLEASE TAKE FURTHER NOTICE** that **your rights may be affected** by the relief sought in the Motion. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Bankruptcy Court to grant the Debtor's Motion, or you want the Bankruptcy Court to consider your views on the Motion, within **17 days**<sup>1</sup> you or your attorney must:

1. File a written objection or response to the Motion explaining your position with the Bankruptcy Court electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to:<sup>2</sup>

**United States Bankruptcy Court**  
Theodore Levin Courthouse  
231 West Lafayette Street  
Detroit, MI 48226

You must also serve a copy of any objection or response upon:

**Jones Day**  
51 Louisiana Ave. NW  
Washington, D.C. 20001-2113  
Attention: Gregory Shumaker

-and-

**Pepper Hamilton LLP**  
Suite 1800, 4000 Town Center  
Southfield, Michigan 48075  
Attn: Robert Hertzberg and Deborah Kovsky-Apap

2. If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

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<sup>1</sup> Concurrently herewith, the Debtor has filed a motion seeking to shorten the notice period and expedite the hearing, if any, on the Motion. If that motion is granted, the Debtor will file an amended Notice of Opportunity to Respond.

<sup>2</sup> A response must comply with F. R. Civ. P. 8(b), (c) and (e).

**PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting such relief.**

Dated: November 22, 2013

Respectfully submitted,

/s/ Deborah Kovsky-Apap

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**ATTORNEYS FOR THE CITY OF  
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